

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

EZEQUIEL DIAZ VICENTE Plaintiff, v. COMMONWEALTH OF PUERTO RICO Defendant.	Civil no. 20-cv-1123 (FAB) Habeas Corpus
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MOTION TO INFORM AND REQUESTING ORDER

TO THE HONORABLE COURT:

Comes now the plaintiff, Mr. Díaz Vicente, and respectfully states and prays as follows:

1. The undersigned has been appointed to represent Mr. Díaz Vicente in his matter before the Court.
2. Unfortunately, the undersigned has not been able to communicate with Mr. Díaz Vicente because the Department of Corrections and Rehabilitation of Puerto Rico, as a preventive measure to address the COVID-19 pandemic, has prevented all legal visits.
3. And although the COVID-19 Protocol of the Department of Corrections and Rehabilitation establishes a system by which attorneys can arrange legal visits through the agency's legal department, all efforts by the undersigned have been pointless. This is not an isolated incident, since others, like the Sociedad Para la Asistencia Legal, have reported a similar experience with the agency. The agency does not pick up the phone.
4. Today, the undersigned traveled to Bayamon 501 only to be told by the agency guards that the Department of Corrections has not authorized the entry of lawyers and that no other mechanisms were available to speak in confidence with the client.
5. It is worth noting that while the undersigned was outside the gates of the institution, the guards informed that various high ranking officials from the Puerto Rico Department of

Justice, including the Chief Deputy Prosecutor, were attending a presentation regarding the new video capabilities designed to assist inmates continue with their educational training.

6. It is for this reason that the undersigned respectfully requests that the Court ORDERs the Commonwealth of Puerto Rico to allow the necessary legal visits with the client who is currently detained at the Bayamon 501 facility.

WHEREFORE, the undersigned respectfully requests that the Court takes note of the present motion and authorize the requested Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of June 2020.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ *Diego H. Alcalá Laboy*
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